

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

IN THE UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
VERMONT

2022 APR 19 PM 3:47

CLERK

BY

DEPUTY CLERK

JANE DOE,

Plaintiff,

v.

VERMONT LAW SCHOOL,
SHIRLEY JEFFERSON,
HEIDI REMICK,
JOSEPH BRENNAN,
BETH McCORMACK,
JESSICA DURKIS-STOKES,
MAUREEN MORIARTY,
ASHLEY ZIA,
CYNTHIA W LEWIS, STEPHANIE
WILBANKS and
DOES 1 THROUGH 25 INCLUSIVE,

Defendants.

CIVIL ACTION NO. 5:22-cv-00084-00085

PLAINTIFF'S MOTION TO PROCEED UNDER PSEUDONYM

The Plaintiff, by counsel, respectfully moves that this Honorable Court allow her to proceed in this action under the pseudonym Jane Doe. In support of this motion, Plaintiff states that through this action Plaintiff seeks to remedy harms imposed due to the Defendant's discriminatory conduct and disclosing her identity as she enters her third year of law school, in this judicial proceeding, would result in a great risk of retaliation from other faculty members, ostracism from student groups, mental-harm, harassment and professional ostracism. The Defendants will not be

prejudiced by allowing the Plaintiffs to press her claims anonymously. Plaintiff further relies upon the memorandum of law submitted herewith.¹

WHEREFORE, the Plaintiff respectfully requests that the Court allow this motion and issue the Proposed Order attached hereto as Exhibit A.

Respectfully submitted,
Jane Doe,
By her attorney,



Albert Fox, Esq.
Chadwick and Spensley
PO Box 6172-11 Main St.
Brattleboro, VT 05302
#651797

Dated: April 19, 2022

¹ ~~In addition to filing the complaint under the pseudonym Jane Doe, the Plaintiff is filing a complaint revealing her identity under seal directly with the Court. The Defendants know the identity of Plaintiff via pre-litigation communication.~~